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TAQI EYR HHAMUL HESED EL	)	
a/k/a "Bro. T. Hesed-El"	)	
Plaintiff(s),	)	CERTIFICATION AND REPORT
	)	OF FED. R. CIV. P. 26(F)
vs.	)	CONFERENCE AND
	)	DISCOVERY PLAN
	)	
Robin Bryson, et al.,	)	
	)	
Defendant(s).	)	

1. Certification of Conference. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on 5/18/2022 (date) [ ] at \_\_\_\_\_ (place) or [✓] by telephone and was conducted by the undersigned counsel for the designated parties in the above captioned case.
2. Pre-Discovery Disclosures. The information required by Fed. R. Civ. P. 26(a)(1) (check one) [ ] has been exchanged [✓] will be exchanged by June 30, 2023 (date).
3. Discovery Plan. The parties jointly propose to the court the following discovery plan:  
  
[Use separate paragraphs or subparagraphs as necessary if parties disagree.]
  - a) All discovery shall be commenced in time to be completed by March 31, 2024 (date). [If needed] Discovery on \_\_\_\_\_ (identify any issues requiring early discovery) will be completed by \_\_\_\_\_ (date).

- b) Discovery Limits:
- 1) Maximum of 20 (ordinarily 20) interrogatories by each party to any other party.
  - 2) Maximum of 20 (ordinarily 20) requests for admission by each party to any other party.
  - 3) Maximum of 6 depositions by plaintiff(s) and 6 by defendant(s) (ordinarily 6 each) [or \_\_\_\_ by each plaintiff and \_\_\_\_ by each defendant].

- c) Reports from retained experts under Rule 26(a)(2) will be due:
- from plaintiff(s) by September 4, 2023 (date)
  - from defendant(s) by October 4, 2023 (date)
- Supplementations under Rule 26(e) due within 30 days (list times(s) or interval(s))

4. Other Items. [Attach separate paragraphs as necessary if parties disagree.]

- a) The parties [☒] request [ ☐ ] do not request a conference with the court before entry of the scheduling order.

- b) All potentially dispositive motions should be filed by February 5, 2024 date, ordinarily one month after the close of discovery).

- c) Settlement:
- [ ☐ ] is likely
- [☒] is unlikely
- [ ☐ ] cannot be evaluated prior to \_\_\_\_\_ (date)
- [ ☐ ] may be enhanced by use of the following ADR procedure:
- [ ☐ ] mediated settlement conference
  - [ ☐ ] binding arbitration
  - [ ☐ ] other \_\_\_\_\_

The parties agree that the above selected ADR procedure would be most useful if conducted:

- [ ☐ ] after resolution of any outstanding dispositive motions, but prior to further discovery;
- [ ☐ ] after an initial round of preliminary discovery to be completed by \_\_\_\_\_ (date);
- [ ☐ ] after the completion of discovery;
- [ ☐ ] after resolution of summary judgment motions, if any;
- [ ☐ ] not applicable.

- d) Final lists of witnesses and exhibits under Rule 26(a)(3) are due:
- from plaintiff(s) by 30 days prior to trial (date)
  - from defendant(s) by 20 days prior to trial (date)

- e) If the case is ultimately tried, trial is expected to take approximately 3-5 days.
- f) [ ] The parties have discussed the issue of consent to the jurisdiction of a U.S. Magistrate Judge, and [ ] there is ☒ there is not unanimous consent. *[If the parties unanimously consent to Magistrate Judge jurisdiction, the parties shall also file with the Court a Notice, Consent, and Reference of a Civil Action to a Magistrate Judge (AO 85)].*
5. Please identify any other matters regarding discovery or case management which may require the Court's attention (e.g., concerns re: confidentiality, protective orders, preservation of ESI materials, unmovable scheduling conflicts, etc.):

	Brother T. Hesed-El	5/18/2023
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<i>Plaintiff's Counsel</i>	<i>Party</i>	<i>Date</i>
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<i>Plaintiff's Counsel</i>	<i>Party</i>	<i>Date</i>
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<i>Plaintiff's Counsel</i>	<i>Party</i>	<i>Date</i>
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<i>Plaintiff's Counsel</i>	<i>Party</i>	<i>Date</i>

/s/Richard Daniels	Mission and Bryson	5/19/23
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<i>Defendant's Counsel</i>	<i>Party</i>	<i>Date</i>
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/s/Phillip Jackson	Mission and Bryson	5/19/23
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<i>Defendant's Counsel</i>	<i>Party</i>	<i>Date</i>
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/s/Daniel Walsh	Mission and Bryson	5/19/23
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<i>Defendant's Counsel</i>	<i>Party</i>	<i>Date</i>
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<i>Defendant's Counsel</i>	<i>Party</i>	<i>Date</i>

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
CIVIL ACTION NO. 1:21-CV-305-MR-WCM

TAQI EYR HHAMUL HESED EL, a/k/a  
"Bro. T. Hesed-El",

Plaintiff,

v.

ROBIN BRYSON, et al.,

Defendants.

**Additional Notes**  
**To Certification and Report of Fed. R.**  
**Civ. P. Rule 26(f) Conference and**  
**Discovery Plan**

The parties respectfully submit the following additional notes:

1. **Section 3(c)**

Supplementation will be due within 30 days of the discovery of the information to be supplemented.

2. **Section 5**

The parties anticipate that they may need a Protective Order to allow for the exchange of medical records, involuntary commitment records, and other confidential information. The parties will work together on drafting a Consent Protective Order to be presented to the Court. If the parties cannot reach an agreement on a Protective Order, they will notify the Court.